

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE FOREIGN EXCHANGE :
BENCHMARK RATES ANTITRUST : No. 1:13-cv-07789-LGS
LITIGATION :
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**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH JPMORGAN CHASE & CO.
AND JPMORGAN CHASE BANK, N.A.**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, in the Courtroom of the Honorable Lorna G. Schofield, Plaintiffs¹ will, and hereby do, move the Court, pursuant to Fed. R. Civ. P. 23(e), for an Order: (i) granting preliminary approval of the proposed settlement (“Settlement”) reached between Plaintiffs and defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPM”) in the above-captioned action; (ii) certifying the putative Class for settlement purposes; (iii) approving the proposed form and manner of giving notice of the Settlement to the Class; (iv) approving Plaintiffs’ choice of a Settlement Administrator, Claims Administrator, and Escrow Agent; and (v) setting a

¹ Plaintiffs are Aureus Currency Fund, L.P.; the City of Philadelphia, Board of Pensions and Retirement; Employees’ Retirement System of the Government of the Virgin Islands; Employees’ Retirement System of Puerto Rico Electric Power Authority; Fresno County Employees’ Retirement Association; Haverhill Retirement System; Oklahoma Firefighters Pension and Retirement System; State-Boston Retirement System; Syena Global Emerging Markets Fund, LP; Tiberius OC Fund, Ltd.; Value Recovery Fund L.L.C.; and United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund (collectively, “Plaintiffs”).

hearing date for final approval of the Settlement and a schedule for various deadlines relevant thereto, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPM are: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; (ii) the Declaration of Christopher M. Burke in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. and the Exhibits thereto; (iii) the Declaration of Kenneth R. Feinberg in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; and (iv) the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice.

Dated: January 30, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2015.

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